

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE NON-JUDICIAL CIVIL FORFEITURE	:	
PROCEEDING REGARDING \$119,005.00 IN	:	<u>STIPULATION AND ORDER</u>
UNITED STATES CURRENCY SEIZED ON	:	
OR ABOUT OCTOBER 24, 2023	:	24 Misc 183
	:	
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WHEREAS, on or about October 24, 2023, the Drug Enforcement Administration (“DEA”) seized \$119,005.00 in United States currency (the “Seized Property”) from Joel Liriano (the “Claimant”), and the DEA initiated an administrative forfeiture proceeding against the Seized Property, pursuant to Title 21, United States Code, Section 881, by timely sending written notice of its intent to forfeit the Seized Property to all known interested parties;

WHEREAS, on January 17, 2024, the DEA received a claim from the Claimant asserting an interest in the Seized Property;

WHEREAS, the DEA subsequently referred the matter to the United States Attorney’s Office for judicial forfeiture;

WHEREAS, no other party has claimed an interest in the Seized Property;

WHEREAS, Title 18, United States Code, Section 983(a)(3)(A) provides that, “not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a Court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties”;

WHEREAS, pursuant to title 18, United States Code, Section 983(a)(3), the United States was required to file a civil complaint to forfeit the Seized Property no later than April 16, 2024;

WHEREAS, the Claimant, through counsel, Renee Wong, Esq. has consented to a 15-day extension of the deadline for the Government to file a complaint against the Seized Property;

WHEREAS, Renee Wong, Esq., attorney for the Claimant, represents and warrants that she is authorized to execute this Stipulation on behalf of her client, Joel Liriano; and


WHEREAS, the Government requests an extension of 15 days to file a complaint from April 16, 2024 to May 1, 2024;

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NOW, THEREFORE, IT IS HEREBY ORDERED, upon agreement of the  
aforementioned parties and pursuant to Title 18, United States Code, Section 983(a)(3)(A), that  
the time in which the Government is required to file a complaint for forfeiture of the Seized  
Property is extended from April 16, 2024 up to and including May 1, 2024.

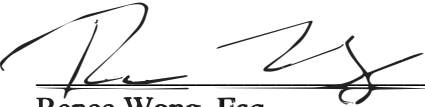
AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:   
\_\_\_\_\_  
Tara La Morte  
Assistant United States Attorney  
26 Federal Plaza, 38<sup>th</sup> Floor  
New York, New York 10278  
(212) 637-1041

4/16/2024

\_\_\_\_\_  
DATE

By:   
\_\_\_\_\_  
Renee Wong, Esq.  
Attorney for Claimant  
Goldberger & Dubin, P.C.  
401 Broadway, Suite 306  
New York, NY 10013

4/15/2024  
\_\_\_\_\_  
DATE

SO ORDERED:

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
DATE